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Moore & Van Allen

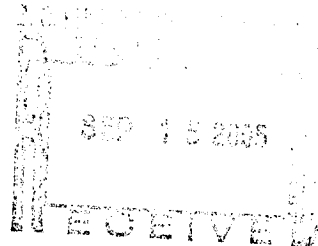
September 14, 2005

James H. Jeffries IV
Attorney at Law

T 704 331 1079
F 704 339 5879
jimjeffries@mvalaw.com

VIA UPS OVERNIGHT

Mr. Charles Terreni
Chief Clerk Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210




Moore & Van Allen PLLC

Suite 4700
100 North Tryon Street
Charlotte, NC 28202-4003

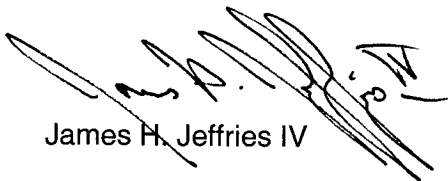
Re: Docket No. 2005-125-G Election of Piedmont Natural Gas Company, Inc. for Application of The Natural Gas Rate Stabilization Act to Its Rates and Charges

Dear Mr. Terreni:

Enclosed please find an original and 26 copies of the *Written Comments of Piedmont Natural Gas Company, Inc.* in the docket shown above. Please accept the original and 25 copies for filing and return the additional "file-stamped" copy in the enclosed self-addressed stamped envelope.

 Thank you for your assistance with this matter. If you have any questions about this filing you may reach me at the number shown above.

Sincerely,



James H. Jeffries IV

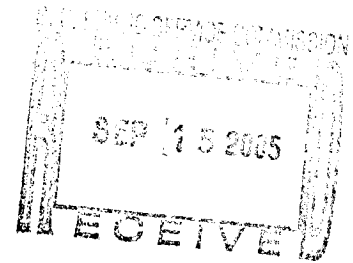
Enclosures

c: ORS (5 copies)
Mr. Scott Elliott
Mr. David Carpenter

Research Triangle, NC
Charleston, SC

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2005-125-G



In the Matter Of

Election of Piedmont Natural Gas
Company, Inc. for Application of
The Natural Gas Rate Stabilization
Act to Its Rates and Charges

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**WRITTEN COMMENTS OF
PIEDMONT NATURAL GAS
COMPANY, INC.**

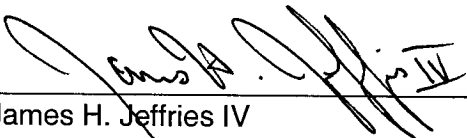
Piedmont Natural Gas Company, Inc. ("Piedmont"), pursuant to Section 58-5-455(4) of the S.C. Code of Laws, hereby submits the following written comments on the *Review of Piedmont Natural Gas Company, Inc.'s Monitoring Report* ("ORS Audit") prepared and filed in this proceeding by the Office of Regulatory Staff ("ORS") on September 1, 2005.

Piedmont has carefully reviewed the September 1, 2005 ORS Audit and the proposed adjustments to Piedmont's June 15, 2005 Quarterly Monitoring Report contained therein and hereby advises the Commission that Piedmont has no objection to or comments on the findings and adjustments reflected in the ORS Audit.

Revised rates and charges incorporating the ORS Audit adjustments are attached hereto as Exhibit A.

Respectfully submitted this 14th day of September, 2005.

PIEDMONT NATURAL GAS COMPANY, INC.


James H. Jeffries IV

OF COUNSEL

Moore & Van Allen PLLC
Suite 4700
100 North Tryon Street
Charlotte, North Carolina 28202-4003
T: (704) 331-1079
F: (704) 339-5879

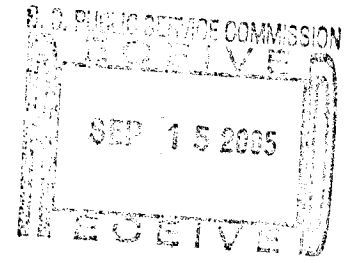


EXHIBIT A

Piedmont Natural Gas Company
 South Carolina
 Proposed Rates
 November 1, 2005

		Proposed Rates
201	Residential - Value	
	Monthly Charge-Winter	10.00
	Monthly Charge-Summer	8.00
	Winter (Nov.-Mar.) Per Therm	1.12014
	Summer (Apr.-Oct.) Per Therm	1.07516
221	Residential - Standard	
	Monthly Charge-Winter	10.00
	Monthly Charge-Summer	8.00
	Winter (Nov.-Mar.) Per Therm	1.28290
	Summer (Apr.-Oct.) Per Therm	1.27456
205	Gas Lights - Unmetered	
	Monthly Charge Per Fixture	15.00
206	Emergency Service	
	Emergency Service Per Therm	\$1.00 + gas cost
	Unauthorized Over Run Penalty Per Therm	\$2.50 + gas cost
202	Small General Service-Standard	
	Monthly Charge	22.00
	Winter (Nov.-Mar.) Per Therm	1.20385
	Summer (Apr.-Oct.) Per Therm	1.17716
232	Small General Service-Value	
	Monthly Charge	22.00
	Winter (Nov.-Mar.) Per Therm	
	First 2,000	1.15259
	Over 2,000	1.12802
	Summer (Apr.-Oct.) Per Therm	
	First 2,000	1.06866
	Over 2,000	1.04350
252	Medium General Service-Standard	
	Monthly Charge	75.00
	Winter (Nov.-Mar.) Per Therm	1.20693
	Summer (Apr.-Oct.) Per Therm	1.16227
262	Medium General Service-Value	
	Monthly Charge	75.00
	Winter (Nov.-Mar.) Per Therm	
	First 5,000	1.12906
	Over 5,000	1.09739
	Summer (Apr.-Oct.) Per Therm	
	First 5,000	1.04391
	Over 5,000	1.02196

Piedmont Natural Gas Company
 South Carolina
 Proposed Rates
 November 1, 2005

		Proposed Rates
242	General Service-Motor Fuel	
	Monthly Charge	22.00
	Winter (Nov.-Mar.) Per Therm	0.90251
	Summer (Apr.-Oct.) Per Therm	0.90133
203	Large General Service	
	Monthly Charge	250.00
	Billing Demand Per Therm	1.90000
	Winter (Nov.-Mar.) Per Therm	
	First 15,000	0.93809
	Next 15,000	0.87750
	Next 75,000	0.83018
	Next 165,000	0.78480
	Next 330,000	0.74369
	Over 600,000	0.71512
	Summer (Apr.-Oct.) Per Therm	
	First 15,000	0.87114
	Next 15,000	0.82603
	Next 75,000	0.79738
	Next 165,000	0.76623
	Next 330,000	0.73869
	Over 600,000	0.71512
204	Interruptible Service	
	Monthly Charge	250.00
	Winter (Nov.-Mar.) Per Therm	
	First 15,000	0.98535
	Next 15,000	0.91875
	Next 75,000	0.86054
	Next 165,000	0.83321
	Next 330,000	0.78340
	Over 600,000	0.75512
	Summer (Apr.-Oct.) Per Therm	
	First 15,000	0.88082
	Next 15,000	0.83317
	Next 75,000	0.79808
	Next 165,000	0.77891
	Next 330,000	0.75369
	Over 600,000	0.72512

Piedmont Natural Gas Company
 South Carolina
 Proposed Rates
 November 1, 2005

		Proposed Rates
213	Large General Service	
	Monthly Charge	250.00
	Standby Demand Per Therm	1.30000
	Billing Demand Per Therm	0.60000
	Winter (Nov.-Mar.) Per Therm	
	First 15,000	0.24867
	Next 15,000	0.18351
	Next 75,000	0.13696
	Next 165,000	0.08480
	Next 330,000	0.04369
	Over 600,000	0.01512
	Summer (Apr.-Oct.) Per Therm	
	First 15,000	0.17306
	Next 15,000	0.12669
	Next 75,000	0.09886
	Next 165,000	0.05535
	Next 330,000	0.03869
	Over 600,000	0.01512
214	Interruptible Service	
	Monthly Charge	250.00
	Winter (Nov.-Mar.) Per Therm	
	First 15,000	0.24908
	Next 15,000	0.18390
	Next 75,000	0.13728
	Next 165,000	0.09053
	Next 330,000	0.04362
	Over 600,000	0.01512
	Summer (Apr.-Oct.) Per Therm	
	First 15,000	0.17366
	Next 15,000	0.12737
	Next 75,000	0.09955
	Next 165,000	0.07153
	Next 330,000	0.03838
	Over 600,000	0.01512

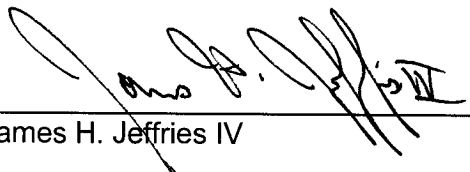
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached *Written Comments of Piedmont Natural Gas Company, Inc.* is being served upon each party of record in this proceeding via UPS Overnight, shipping prepaid to the following:

Benjamin P. Mustian, Counsel
Office of Regulatory Staff
1441 Main Street, Suite 300
Columbia, South Carolina 29201

Scott Elliott, Counsel
South Carolina Energy Users Committee
Elliott & Elliott, P.A.
721 Olive Street
Columbia, South Carolina 29205

This the 14th day of September, 2005.



James H. Jeffries IV